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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: ALLERGAN BIOCELL TEXTURED
BREAST IMPLANT PRODUCTS LIABILITY
LITIGATION

Case No. 2:19-md-2921 (BRM)(LDW)
MDL No. 2921

PLAINTIFFS' NOTICE OF
VIDEOTAPED DEPOSITION OF
BROOKE BLAIR

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Plaintiffs, by and through their counsel of record, will take the deposition by oral examination of Brooke Blair. The deposition will take place beginning at 8:00 am EST on November 21, 2024, at Reed Smith, 506 Carnegie Center Drive, Suite 300, Princeton, NJ 08540 and with remote participants attending via secure, web-based audio-video conferencing technology, or at such other time and location as agreed upon by counsel, and shall continue from day-to-day thereafter until completed. The deposition will be taken before a duly qualified notary public or other officer authorized by law to administer oaths and record testimony pursuant to Rule 28. The deposition will be recorded by video, audio and stenographic

means. Provisions for real-time monitoring via LiveNote TM or similar applications may also be used.

The deposition may be used to preserve testimony for trial, to obtain discovery, and for any other purpose authorized by the Federal Rules of Civil Procedure. Plaintiff reserves the right to use at the trial of this action the videotape recording of the deposition of the deponent pursuant to Rule 32.

Dated: October 15, 2024

/s/ James Cecchi
Liaison Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify the above Notice of Deposition was served electronically on Defendants by operation of the Court's CM/ECF system.

Dated: October 15, 2024

/s/ James Cecchi
Liaison Counsel for Plaintiffs